## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER CHO, ET AL.,

Defendants.

Civil Action No.: 2:23-cv-3709

**Document Electronically Filed** 

# LETTER OF COVER TRANSMITTING DEFENDANTS PETER CHO, BIOSURE GLOBAL, LTD., SALVACION USA, INC., AND SALVACION INTERNATIONAL LLC'S CONSOLIDATED MOTION TO DISMISS MATERIALS

LADDEY, CLARK & RYAN, LLP Thomas N. Ryan (018951985) Thomas J. White (320372020) 60 Blue Heron Road, Suite 300 Sparta, New Jersey 07871-2600 Telephone: (973) 729-1880; Facsimile: (973) 729-1224 tryan@lcrlaw.com twhite@lcrlaw.com

Attorneys for Defendants Salvacion, USA, Inc.; Salvacion Co., LTD.; Yeong Wan Cho (aka Peter Cho); Salvacion R&D Center; Salvacion International, LLC; Sei Young Yun; Biosure Global, Ltd. Bradley Arant Boult Cummings LLP Jason E. Fortenberry (pro hac vice)
Jonathan M. Barnes (pro hac vice)
188 East Capitol Street, Suite 1000
Post Office Box 1789
Jackson, Mississippi 39215-1789
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
jfortenberry@bradley.com
jbarnes@bradley.com

Jeffrey D. Dyess (pro hac vice) Benn C. Wilson (pro hac vice) 1819 5th Avenue North Birmingham, Alabama Telephone: (205) 521-8000 Facsimile: (205) 521-8800 jdyess@bradley.com bcwilson@bradley.com

Attorneys for Defendants Salvacion, USA, Inc.; Salvacion Co., LTD.; Yeong Wan Cho (aka Peter Cho); Salvacion R&D Center; Salvacion International, LLC; Sei Young Yun; Biosure Global, Ltd.

#### Dear Counsel for Plaintiff:

On October 2, 2023, Defendants Peter Cho, BioSure Global, Ltd., Salvacion, USA, Inc, and Salvacion International, LLC filed individual motions to dismiss [Docs. 38-41]. On October 4, 2023, the Court entered a Text Order [Doc. 42] directing the moving defendants to consolidate their four motions by October 25, 2023.

Accordingly, pursuant to the Court's October 4, 2023 Text Order and former Appendix N to the Court's Local Rules, Counsel for Defendants Peter Cho, BioSure Global, Ltd., Salvacion, USA, Inc, and Salvacion International, LLC hereby serve under cover of this transmittal letter their Consolidated Motion Materials, which include:

- 1. Notice of Consolidated Motion;
- 2. Exhibit A to Notice of Consolidated Motion;
- 3. Memorandum Supporting the Consolidated Motion;
- 4. Proposed Order.

Sincerely,

/s/ Thomas J. White
Thomas J. White (320372020)

Filed with the Clerk of the Court w/o Enclosures Via CM/ECF system on October 25, 2023.

### Transmitted w/ Enclosures Via Electronic Mail on October 25, 2023 to:

LAW OFFICE OF KEITH ALTMAN Solomon Radner (NJ SBN 283502018) Keith Altman (pro hac vice) 33228 West 12 Mile Road, Suite 375 Farmington Hills, Michigan 48331 SolomonRadner@kaltmanlaw.com KeithAltman@kaltmanlaw.com Attorneys for Plaintiff

#### LAW OFFICE OF KEITH ALTMAN

Stanley Kremen (pro hac vice)
33228 West 12 Mile Road, Suite 375
Farmington Hills, Michigan 48331
StanleyKremen@kaltmanlaw.com
NEW JERSEY LOCATION:
4 Lenape Lane
East Brunswick, NJ
shk@shk-dplc.ocm
Attorney for Plaintiff